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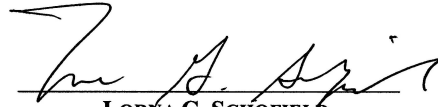
March 24, 2023

VIA ECF

Hon. Lorna G. Schofield
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Application Granted. Defendants' motion(s) shall be filed by **June 6, 2023**. The Government's response shall be filed by **July 5, 2023**. Defendants' reply shall be filed by **July 19, 2023**. The status conference previously scheduled for June 5, 2023, is adjourned to **July 17, 2023, at 10:30 a.m.** The Clerk of the Court is directed to terminate the letter motion at docket number 58.

Dated: March 27, 2023
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: **United States v. Liaquat Cheema, et al., 22-CR-00615(LGS)**
Unopposed Request for Modification of Scheduling Order

Dear Judge Schofield:

On behalf of defendant Ali Cheema and all other defendants (together, the "Defendants") in the above-captioned action, we respectfully request that Your Honor modify the scheduling order of November 18, 2022 ([ECF No. 49](#)), for the reasons set forth below. We have conferred with counsel for the Government, who does not oppose our request and consents to our proposed due dates. Defendants respectfully request that the scheduling order be modified by extending the existing due dates by 60 days, including an adjournment of the June 5, 2023 status conference, as follows:

Event	Original Due Date	Proposed New Due Date
Defendants' Motions	4/7/2023	6/6/2023
Government's Responses	5/5/2023	7/5/2023
Defendants' Replies	5/19/2023	7/19/2023
Status Conference	6/5/2023 at 10:30 AM	8/4/2023 at 10:30 AM (or whichever date Your Honor deems appropriate)

As Your Honor knows, the Government indicted the Defendants on November 9, 2022, [Dkt. No 35](#), on various charges as to each defendant, such as conspiracy to commit wire fraud, aggravated identity theft, conspiracy to commit money laundering, and conspiracy to commit health care fraud. Discovery commenced on or about December 13, 2022. In light of the complex and voluminous discovery in this



case, Your Honor appointed Julie de Almeida as Coordinating Discovery Attorney on February 10, 2023 ([ECF No. 55](#)), to help process and facilitate the discovery.

Since her appointment as CDA, Ms. De Almeida has been in continuous contact with the Government, including obtaining copies of the discovery previously produced to Defendants. She initially contacted the Government on February 16, 2023 and sent the Government a hard drive for the discovery by cover letter dated February 19. The hard drive, loaded with approximately 6.5 terabytes of data, was delivered to her P.O. box on February 28. Ms. de Almeida is working through processing this data. Further, in the course of processing the discovery produced by the Government, Ms. de Almeida has encountered some technical issues requiring certain replacement files and other technical data from the Government. We understand that Ms. de Almeida received substantially all of these technical and replacement files on or about March 15, 2023.

In light of the foregoing, Defendants respectfully request additional time in order to adequately review the discovery prior to the upcoming due date for Defendants' motions.

This is Defendants' first request to modify the scheduling order seeking additional time. We have conferred with counsel for the Government, and the Government does not oppose our request.

Upon reviewing the discovery, should Defendants determine that we may need additional time to prepare motions, we will seek a further modification at the appropriate time, setting forth the bases for any such request.

Thank you for Your Honor's consideration, and we remain available to discuss any questions Your Honor may have.

Respectfully submitted,

Crowell & Moring LLP

/s/ Kelly T. Currie

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Attorneys for Defendant Ali Cheema

cc: Timothy Capozzi, Esq., counsel for the Government (by ECF)
All defense counsel (by ECF)